

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

JUN 20 2023

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT. WESTERN DIST. OKLA.
BY , DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

QUAN LI SUM,

a/k/a Dhengli Sun, and

JIAN HUI WU,

Defendants.

No.

CR 23-257 SLP

Violations:

21 U.S.C. § 846

18 U.S.C. § 924(c)(1)(A)

18 U.S.C. § 924(d)

21 U.S.C. § 853

28 U.S.C. § 2461(c)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1
(Drug Conspiracy)

From on or about December 1, 2022, the exact date being unknown to the Grand Jury, through on or about May 16, 2023, in the Western District of Oklahoma and elsewhere,

----- **QUAN LI SUM,**
a/k/a Dhengli Sun, and
JIAN HUI WU -----

knowingly and intentionally conspired, combined, confederated, and agreed with each other and others, both known and unknown to the Grand Jury, to interdependently possess with intent to distribute and to distribute 1,000 or more marihuana plants, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846, the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

COUNT 2

(Possession of a Firearm in Furtherance of a Drug-Trafficking Crime)

On or about May 16, 2023, in the Western District of Oklahoma,

----- **QUAN LI SUM,**

a/k/a Dhengli Sun, -----

knowingly and intentionally possessed a firearm, specifically: a Glock, model 48, 9mm caliber pistol, bearing serial number BSNN437, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to distribute and to distribute marihuana plants, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as described in Count 1 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A), the penalty for which is found at Title 18, United States Code, Sections 924(c)(1)(A)(i) and (D)(i) & (ii).

COUNT 3

(Possession of Firearms in Furtherance of a Drug-Trafficking Crime)

On or about May 16, 2023, in the Western District of Oklahoma,

----- **JIAN HUI WU** -----

knowingly and intentionally possessed firearms, to wit:

1. a Norinco, model Sporter, 7.62 caliber rifle, bearing serial number 01497, with attached scope, strap, and bayonet; and
2. a Glock, model 22, .40 caliber pistol, bearing serial number GCY056, with attached laser/flashlight,

in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to distribute marihuana plants, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) (as described in Count 1 of this Indictment).

All in violation of Title 18, United States Code, Section 924(c)(1)(A), the penalty for which is found at Title 18, United States Code, Sections 924(c)(1)(A)(i) and (D)(i) & (ii).

FORFEITURE

The allegations contained in this Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1 of this Indictment, **QUAN LI SUM** shall forfeit to the United States any property constituting or derived from any proceeds obtained directly or indirectly as a result of such offense and any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such offense.

Upon conviction of the offense alleged in Count 2 of this Indictment, **QUAN LI SUM** shall forfeit to the United States any and all firearms and ammunition involved in the commission of the offense.

Upon conviction of the offense alleged in Count 1 of this Indictment, **JIAN HUI WU** shall forfeit to the United States any property constituting or derived from any proceeds obtained directly or indirectly as a result of such offense and any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such offense.

Upon conviction of the offense alleged in Count 3 of this Indictment, **JIAN HUI WU** shall forfeit to the United States any and all firearms and ammunition involved in the commission of the offense.

The property subject to forfeiture includes, but is not limited to:

1. real property located at 2255 County Road 1410, Alex, Oklahoma, 73002;
2. approximately \$31,522.00 in U.S. currency;
3. a Glock, model 48, 9mm caliber pistol, bearing serial number BSNN437;
4. a Norinco, model Sporter, 7.62 caliber rifle, bearing serial number 01497, with attached scope, strap, and bayonet;
5. a Glock, model 22, .40 caliber pistol, bearing serial number GCY056, with an attached laser/flashlight; and
6. any and all ammunition and magazines not specified herein.

All pursuant to Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461(c).

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER
United States Attorney



WILSON D. MCGARRY
Assistant United States Attorney